

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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Nov 3 446 5

REPLY: TO THE ATTENTION OF:

OCT 31 1997

Mr. Johnny W. Reising United States Department of Energy Feed Materials Production Center P.O. Box 398705 Cincinnati, Ohio 45239-8705

SRF-5J

RE: Recycling Project Work Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) work plan for recycling, supplemental projects.

This work plan details the recycling projects required pursuant to the July 22, 1997, dispute resolution agreement between U.S. EPA and U.S. DOE.

Overall, the work plan meets the requirements of the dispute resolution agreement. However, a few areas require further information and clarification.

Therefore, U.S. EPA disapproves the recycling projects work plan pending incorporation of adequate responses to the attached comments. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric

Remedial Project Manager Federal Facilities Section SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON "WORK PLAN FOR RECYCLING SUPPLEMENTAL ENVIRONMENTAL PROJECTS" FERNALD ENVIRONMENTAL MANAGEMENT PROJECT, FERNALD, OHIO

SPECIFIC COMMENTS

Commentor: Saric Commenting Organization: U.S. EPA Section #: 3.1 Page #: 3 Line #: 13 Comment: The text states that an additional 220 tons of rail will be removed using the strategies and decontamination and dismantlement (D&D) specifications outlined in the Operable Unit 3 integrated remedial design/remedial action work plan. However, the text in Section 3.1, Page 3, Lines 5 through 9, describes three projects that address another approximately 180 tons of existing site railroads. The three projects include: (1) the dismantlement of the boiler plant/water plant complex, (2) the dismantlement of the thorium/plant 9 complex, and (3) construction of the on-site disposal facility (OSDF) Haul Road. The text should be revised to describe the strategies that will be used to remove the 180 tons of steel rail from the three projects.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 3.1 Page #: 3 Line #: 19 Comment: The text states that the rail and angle bars will be size-reduced, released, and sold as scrap metal. The work plan does not discuss where and how rail and angle bar size reduction will be conducted. The text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 3.2 Page #: 3 Line #: 27 Comment: The text states that "clean" copper ingots were produced for beneficial reuse. Because the copper ingots will be either disposed of in the On-Site Disposal Facility (OSDF) or released after development of release limits to address the minimal volumetric (mass) contamination contained in the ingots, it may be misleading to describe the ingots as "clean." The text should be revised to delete the word clean.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 3.0 Page #: Figure Line #: NA Comment: Figure 1, titled "Proposed/Existing MRF Location and R.R. Spurs," shows the rail within the boiler plant/water plant complex and the thorium/plant 9 complex. However, text in Section 3.1, Page 3, Line 6, discusses dismantlement of portions of existing on-site railroads within the scope of three projects, including the project involving

construction of the OSDF Haul Road. Figure 1 should be revised to show the rail within the scope of the project involving construction of the OSDF Haul Road.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 4.1 Page #: 6 Line #: 11 Comment: The text states that after blasting, the baking soda and contaminant mixture will be washed away using additional water, stored, and subsequently treated. The text does not indicate how this washwater will be collected for storage or how decontamination of storage vessels will be performed. Text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 4.1 Page #: 6 Line #: 31 Comment: The text states that after vacuum grit blasting, if the resulting waste requires stabilization, the stabilized waste will be sampled and characterized for toxicity characteristic leaching procedure (TCLP) metals, as well as for the radiological characterization requirements of the Nevada Test Site (NTS). The text does not indicate what activities will be conducted after sampling and characterization. The text should be revised to include this information.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 5.0 Page #: 7 Line #: 7 Comment: The text states that all vendor bids will be evaluated, and if the bid is preferential to processing the metal through the MRF, a task order will be placed. The text in Section 2.0, Page 2, Line 17, indicates that DOE will use a life-cycle approach to determine if a vendor will be used instead of the MRF. The text in Section 5.0, Page 7, Line 7, should be revised to describe the life-cycle approach that will be used to determine if a vendor or the MRF will be used to decontaminate and release materials for unrestricted use.

Commenting Organization: U.S. EPA Saric Commentor: Page #: 10 Section #: 7.0 Line #: 22 Comment: The text states that Table 3 identifies estimated project costs for decontaminating and releasing the identified types and quantities of metals discussed in Section 3. However, the text does not discuss methods and assumptions used to estimate project costs for the general activities listed in Table 3. The text should be revised to discuss detailed activities that will be conducted to accomplish the general activities presented in Table 3. text should also be revised to discuss how costs were developed for each detailed activity and the general activities presented in Table 3.